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*Counsel for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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MedWell LLC, a limited liability company )

Plaintiff, )

v. )

CIGNA Corporation; CIGNA Health and )  
Life Insurance Company; CIGNA )  
Healthcare of New Jersey, Inc.; )  
Connecticut General Life Insurance )  
Company; John Does and Jane Does 1-20; )  
and XYZ Corporations and ABC )  
Partnerships 1-20, )

Defendants. )

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Case No. 2:20-cv-10627-KM-ESK

***Document Filed Electronically***

**NOTICE OF MOTION FOR  
PRO HAC VICE ADMISSION OF  
EDWARD T. KANG**

**TO:** Christopher Salloum  
**SARMASTI PLLC**  
Fairfield Commons  
271 U.S. Highway 46 West, Suite A205  
Fairfield, NJ 07004  
chris@sarmastipltc.com  
*Attorneys for Plaintiff MedWell LLC*

**PLEASE TAKE NOTICE** that on November 9, 2020 at 9 a.m., or as soon thereafter as counsel may be heard, pursuant to L. Civ. R. 101(c), the undersigned attorney for Defendants Cigna Corporation, Cigna Health and Life Insurance Company, Cigna Healthcare of New Jersey,

Inc., and Connecticut General Life Insurance Company (together, “Cigna” or “Defendants”), shall move before the United States District Court, District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order admitting Edward T. Kang, Esq. to appear *pro hac vice* in the above-captioned action.

**PLEASE TAKE FURTHER NOTICE** that in support of said application, the Defendants shall rely on the accompanying declarations of Edward T. Kang, Esq. and Steven L. Penaro, Esq. Oral argument is requested if opposition to this motion is filed. A proposed form of Order is also attached hereto.

**LOCAL CIVIL RULE 7.1 STATEMENT**

The undersigned hereby certifies that, to the best of his knowledge, no brief or memorandum of law is necessary in support of the within motion as the issues raised thereby involve no complicated issues of law.

Dated: October 2, 2020

*/s/ Steven L. Penaro*

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